

26 Court Street, Suite 1200 Brooklyn, New York 11242 Tel: 718-989-2444 Fax: 718-989-2887

www.michaelmullenlaw.com

July 29, 2020

Via ECF:

Honorable Alvin K. Hellerstein United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 So ordered.

/s/ Alvin K. Hellerstein 7/29/2020

Re: *United States v. Valle, et. al.*, Case No. 1:13-cr-00058 (AKH)

Dear Judge Hellerstein:

This office represents Defendant Jancey Valle ("Mr. Valle") in the above-referenced matter. This correspondence is respectfully submitted to request that a condition of Mr. Valle's release be modified to allow him to reside with his mother Yvelisse Valle ("Ms. Valle") instead of his father Dr. Charlie M. Valle ("Dr. Valle") during his first year of home confinement.

By Order dated July 23, 2020, this Court granted Mr. Valle's compassionate release motion and, as a condition of supervised release, ordered Mr. Valle to "be subject to home confinement at the residence of Dr. Charlie M. Valle, at 4 Chestnut Street, Rutherford, New Jersey, for the first year of supervised release...." (Doc. No. 753 at ¶ 1.)

We respectfully move to modify this condition for Mr. Valle to "be subject to home confinement at the residence of Yvelisse Valle, at 2100 Linwood Avenue, Apartment 9A, Fort Lee, New Jersey, for the first year of supervised release."

I conferred with Probation Officer Afonso Fernandes and Assistant United States Attorney Sarah L. Kushner, they do not object to the modification of condition of release, as stated above.

We ask the Court to expeditiously decide this motion as Mr. Valle is still incarcerated.

Respectfully submitted,

/s/ Leopold Gross

Cc: Sarah L. Kushner, U.S. Attorney's Office (via ECF) Afonso Fernandes, Probation Officer (via email)